

# **EXHIBIT K**



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July 22, 2025

**VIA E-MAIL**

Kristin Tahler, Esq.  
Quinn Emanuel  
865 South Figueroa Street, 10th Floor,  
Los Angeles, CA 90017

**Re: Jones et al. v. Abel et al., No.: 1:25-cv-00779-LJL (S.D.N.Y.)**

Dear Ms. Tahler:

On behalf of non-parties Katherine Case and Breanna Butler Koslow, we write in response to your letter dated July 21, 2025, in which you demand that each produce documents responsive to your subpoenas by July 25, 2025.

“As a reminder,” we met and conferred with Nicholas Inns of your firm regarding your subpoenas on Ms. Case and Ms. Butler Koslow once, on March 21, 2025. As made clear during that (single) meet and confer, your subpoenas are improper as propounded: they are plainly overly broad, invasive, and place an undue burden on our non-party clients. As stated in that meet and confer, we will not be searching for and producing documents responsive to your requests. You were previously advised that if you wished for our clients to produce materials to you, you should withdraw your subpoenas and re-serve them with narrowed requests.

Further, the Court’s order regarding production in response to Ms. Lively’s subpoenas has no bearing on your subpoenas. By contrast to your conduct, Ms. Lively’s counsel repeatedly met and conferred with us, negotiated significant limitations to their requests, promised that they would bear certain costs, and more. We have received no such concessions from you, as a result, your belated, unilateral demand is rejected.

Regarding your deposition subpoenas, please let us know when you are available to confer.

Very truly yours,

A handwritten signature in blue ink, appearing to read "DJ Pohlman".

Daniel J. Pohlman